PART V

COMPLIANCE REVIEW CHECKLIST

I.   Introduction

The administrative file review performed by the Database and Administration Team of the

Enforcement Division is an important element of Permit Compliance System (PCS) maintenance. It

is an annual review of the Central Record files and is often the only opportunity to review the overall

compliance status of a permittee. It is also used as a quality control measure for reviewing all facility

level data stored in PCS on each permittee to ensure the accuracy of data in the database. The

administrative file review for cases under enforcement will be performed by the E.C. and all other

administrative file reviews will be performed by Database and Administration Team staff.

II.   Review Procedures

As discussed above, for those cases currently under formal enforcement action the E.C. will perform

the administrative review using the following process. The E.C. will request a Facility Report

printout from PCS one week prior to the scheduled review. The Facility Report is used to:

1.   Research the permit.

   a.   Check the effective date on the permit against the facility report to ensure that PCS

           is current.

   b.   Check the expiration date on the permit and confirm with the Permitting Section,

           Applications Team that a permit renewal application has been received if the permit

will expire within six (6) months.

c.   Review outfall data to confirm active status.

2.   Review the permittee's schedule of compliance.

a.   Compare the schedule of compliance listed in the Facility Report against the current compliance schedule in the permit or any schedules contained in any subsequent enforcement actions. Any discrepancies between the Facility Report and the enforcement actions must be researched and reconciled.

b.   If there are any delinquent compliance reports from an enforcement action, the designated E.C. must take appropriate action. If there are delinquent compliance reports from a permitted compliance schedule, the E.C. will request the delinquent report immediately.

3.   Review the Self-Reporting Forms

a.   Ensure all DMRs have been received and are complete. If not, request the delinquent reports or omitted data through written correspondence.

b.   Check the DMR for completeness.

1.   Has a DMR been received for each month?

2.   Has a DMR been received for each outfall or combination of outfalls?

3.   Are the DMRs complete? Are the required parameter values included?

4.   Were frequency of analyses and sample type reported? Do they agree with the permit requirements?

5. Has the permittee made changes to the permit limits on the DMR? If so, determine why the change was made. If PCS is incorrect, complete the necessary code sheets and submit to the data entry staff for entry into PCS. If the permittee is in error, notify them of the error and what the correct limits are.

6. Were the forms signed by the principal executive officer or an authorized agent of the permittee?

7. Are the DMRs forms being received on time?

c. Ensure that all VRAC violations have been addressed.

4. Review the Noncompliance Reports

a. Ensure that all noncompliances have been listed on the Violation Summary Log.

5. Review the Inspection Data

a. Ensure that the inspection data is entered correctly into PCS. The date of inspection, type of inspection and the individual performing the inspection should be in agreement.

6. Review Correspondence

a. Confirm that all correspondence from the permittee has been reviewed and responded to within necessary time frames.

b. Confirm that all Commission correspondence has been responded to when a written

response from the permittee was requested.

7.   Review Enforcement Data

a.   All pending and active enforcement actions must be coded or screened for PCS data

entry by the Database and Administration Team staff and quality control measures

must be taken by both the Database and Administration Team staff and the data entry

staff to ensure the data is entered correctly.

8.   Review the Pretreatment Data

a.   Ensure that all pretreatment compliance inspections, pretreatment audits, and annual

reports have been entered correctly into PCS from the code sheets provided.

9.   Review the Sludge Management Program

a.   Ensure that all annual sludge reports have been submitted and that the sludge

management information has been entered correctly into the Commission Sludge

Inventory Database.

<u>Completion of Review</u>

When the review of the file is complete, the E.C. (for active enforcement cases) will determine if any

further enforcement action should be initiated.

If all noted discrepancies are of an administrative nature, the assigned E.C. will draft the appropriate

letter to resolve the problem. Any missing information will also be requested. If violations are identified and VRAC is automatically met or exceeded, the appropriate action will be initiated.

If the review was performed by the Database and Administration Team staff, any errors or discrepancies identified in PCS will be corrected through correspondence with the permittee. If the discrepancies were the result of Commission data input errors, the appropriate code sheets will be completed and submitted to the data entry staff for correction.

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